

CC Docket No. 94-102 – E911 Interim Report

Filed by: MoCelCo, L.L.C.
□ David Walker
1562 Park Street, Unit E
Castle Rock, CO 80104-3113

Date: July 31, 2003

To: Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

By Electronic Submission:

John Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

David Solomon, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

TIER III CARRIER INTERIM REPORT

CC Docket No. 94-102

MoCelCo, L.L.C. ("MoCelCo") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002 (*Non-Nationwide Carrier E911 Order*), and *Public Notice*, DA 03-2113, released June 30, 2003.

Carrier Identifying Information:

Carrier Name: MoCelCo, L.L.C. – FRN 0005-9338-66

E911 Compliance Officer: David Walker
1562 Park Street, Unit E
Castle Rock, CO 80104-3113

E911 Implementation Information:

In February 2003, FCC rules changed, and carriers were given the flexibility to pursue alternative business models. MoCelCo has moved to an alternative business model, specifically, becoming a "carriers' carrier". Thus, MoCelCo has no retail business, providing only wholesale service to other carriers. MOCELCO THUS HAS NO SUBSCRIBERS AND WILL NOT HAVE ANY SUBSCRIBERS. Based on this premise, MoCelCo hereby reports as follows:

- ☐ MoCelCo has received one Phase I request and one Phase II request, both from the same PSAP. MoCelCo has obtained and installed all of the network equipment and software necessary to meet the PSAP's Phase I request. However, MoCelCo is dependent on a landline between the switch and the requesting PSAP for Phase I deployment, and is currently still working with the local exchange carrier ("LEC") to have a landline installed. MoCelCo's system operates in rural areas, and it can take a LEC as long as 12 or even 18 months to install a new landline in a rural area. Thus, while MoCelCo anticipates meeting the PSAP's Phase I request within the requisite six-month period, there is a possibility that it will take longer than six months because of the installation of the landline connection to the PSAP. MoCelCo anticipates installation of the landline to be completed in the very near future.
- ☐ MoCelCo is employing a handset-based solution for incoming roamers. MoCelCo is using TDMA technology supplied by Airbiquity. Airbiquity is based in the State of Washington.
- ☐ MoCelCo intends to serve incoming roamers using a handset-based solution. As such, MoCelCo has installed all of the necessary network equipment for Phase I E911 deployment. MoCelCo anticipates a significant problem with its Phase II E911 deployment. Specifically, MoCelCo elected to use a handset-based solution for its E911 deployment, because it was the only attainable solution, either technically or financially. Recently, the FCC ruled that

Airbiquity, the only vendor of TDMA handset-based solutions, was not offering a Phase II-compliant handset. Now, neither Airbiquity nor any other vendor will be supporting a handset-based TDMA solution. Moreover, MoCelCo is unable to switch to a network-based solution, because it is technically impossible. For a network-based solution to function, a handset must be located within the reliable service area of at least three cell sites simultaneously, in order to triangulate the position of the handset. MoCelCo operates only in remote, rural areas where the cell sites are spread far apart and there is little overlap between two cells, and never any overlap among three cells. Thus, a roamer's handset would ever be located within the reliable service area of three cells simultaneously, and triangulation of its position would be impossible.

- ☐ MoCelCo obtained ALI-capable handsets from Airbiquity prior to the October 1, 2002 deadline, such that they were available if requested. MoCelCo did you encounter any problems in obtaining or negotiating agreements to obtain these ALI-capable handsets. MoCelCo added no new subscribers after October 1, 2002. As previously discussed, following the rule change to allow licensees to operate entirely as a "carriers' carrier", MoCelCo went to that business model. MoCelCo currently has no subscribers, but, rather, serves only the customers of other carriers. MoCelCo will not have any future subscribers.
- ☐ MoCelCo does not anticipate that full Phase II service will ever be available in its network, for the reasons discussed above pertaining to the issues with the absence of any available Phase II TDMA handsets and the impossibility of employing a network-based solution, both of which are beyond MoCelCo's control. MoCelCo will be filing a request with the Commission for a permanent waiver of the Phase II requirements in the near future.
- ☐ With regard to meeting the ultimate implementation date of December 31, 2005, see above.